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PLEASE DO NOT REPLY TO THIS OFFICE

September 26, 2022

VIA ECF

The Honorable Judith C. McCarthy
United States Magistrate Judge
Southern District of New York
300 Quarropas Street
White Plains, New York 10601

APPLICATION GRANTED

Judith C. McCarthy

Hon. Judith C. McCarthy

9-26-2022

Re: *United States v. Julio Alberto Taveras Abreu*
21 Mag. 11434

Dear Judge McCarthy:

Please recall that Peter Frankel, Esq., and I represent Mr. Julio Alberto Taveras Abreu in the above-referenced matter. For the reasons that follow, I write to respectfully request that Your Honor permit Mr. Taveras Abreu to travel to the Commonwealth of Pennsylvania on Friday, September 30, 2022 for a court appearance in a pending criminal prosecution against him in the Monroe County Court of Common Pleas. I have consulted with A.U.S.A. Kevin Sullivan and United States Pretrial Services Officer Laura Gialanella, both of whom have no objection to this request.

Currently, Mr. Taveras Abreu is at liberty on a \$100,000 personal recognizance bond set before Your Honor on December 2, 2021. The terms of the bond are as follows: travel restricted to the Southern and Eastern Districts of New York and, upon application to the Court, to Pennsylvania for court appearances; the surrender of all travel documents to Pretrial Services and no new applications; supervision as directed by Pretrial Services; and GPS monitoring and home detention. On March 4, 2022, Magistrate Judge Paul E. Davidson modified Mr. Taveras Abreu's bail conditions to permit him to attend religious services at Iglesia Casa de Jehova in White Plains, New York, and to permit him to travel to our Manhattan office when necessary without needing to obtain pre-approval from Pretrial Services. On April 1, 2022, Your Honor modified Mr. Taveras Abreu's bail conditions to permit him to obtain employment.

As Your Honor is aware, Mr. Taveras Abreu has a criminal case pending in the Commonwealth of Pennsylvania. On June 2, 2022, Judge Jonathan Mark of the Monroe County Court of Common Pleas issued an Order scheduling a Final Call of the List for September 30, 2022 at 8:30 a.m.¹ If granted the requested modification, Mr. Taveras Abreu would travel to the

¹ The June 2, 2022 Order is attached hereto.

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Monroe County Courthouse, located at 610 Monroe Street in Stroudsburg, Pennsylvania, on September 30, 2022 for his 8:30 a.m. court appearance. Mr. Taveras Abreu would then promptly return to his home. Thank you for your consideration of this request.

Respectfully submitted,



Mark I. Cohen

MIC/gmf

Cc: A.U.S.A. Kevin Sullivan (via ECF)
U.S.P.T.S.O. Laura Gialanella (via ECF)
Mr. Julio Alberto Taveras Abreu (via email)